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Proposed Counsel for Debtor

United States Bankruptcy Court  
Eastern District of Texas  
Sherman Division

**In re:**  
**Empire Countertops, LLC**  
**Debtor(s)**

**Case No. 22-41686-btr**  
**Chapter 11**

**DECLARATION UNDER PENALTY OF PERJURY OF**  
**WARREN V. NORRED IN SUPPORT OF THE APPLICATION TO**  
**EMPLOY NORRED LAW PLLC AS COUNSEL TO EMPIRE COUNTERTOPS, LLC**  
(28 U.S.C. § 1746)

STATE OF TEXAS           §  
   §  
COUNTY OF TARRANT   §

I, Warren V. Norred, do hereby declare as follows:

1. I am an attorney of the firm of Norred Law PLLC (“Norred Law”). I am admitted to practice before the United States District Court for the Northern District of Texas and other federal district courts in Texas. I am a member in good standing of the Texas State Bar. Unless otherwise stated herein, I have personal knowledge of the facts stated herein. To the extent that any information disclosed herein requires amendment or modification upon the Debtor’s completion of further analysis or as additional creditor information becomes available to Norred Law, a supplemental Declaration will be submitted to the Court reflecting the same.

2. I am filing this Declaration in support of the Application filed by Empire Countertops, LLC (“Debtor”) for entry of an Order pursuant to 11 U.S.C. §§ 327(e) and 328, and Federal Rule of

Bankruptcy Procedure 2014, authorizing the Employment and Retention of Norred Law as counsel for the Debtor in this chapter 11 case (the “Application”).

3. All attorneys comprising or employed by Norred Law who will perform services for the Debtor are duly admitted to practice law in one or more states.

4. In preparing this Declaration and the other descriptions of presently known connections and relationships set forth herein, Norred Law used a set of procedures designed to ensure full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules of the Court. In accordance with such procedures, I caused to be performed, a review of the connections and relationships between Norred Law and the Debtor’s known lenders and creditors, the Debtor’s accountants, as well as other parties in interest with respect to this chapter 11 case. In conducting this review, Norred Law searched its database of clients and opposing parties for the names of the foregoing parties.

5. Based upon the information available to me, after following the procedures described herein, and except as otherwise described herein, Norred Law neither holds nor represents an interest adverse to the Debtor and its estate with respect to this bankruptcy filing.

6. It is contemplated that Norred Law services for the Debtor will be compensated at the Firm’s regular hourly rates for such services, and the Firm will be reimbursed for all reasonable and necessary expenses pursuant to the provisions of sections 327, 330, and 331 of the Bankruptcy Code. Norred Law’s current hourly rates for attorneys and paraprofessionals for services Norred Law will provide to the Debtor range from \$90.00 to \$450.00 per hour. These rates are subject to periodic change in the ordinary course of business. Norred Law also bills its clients in all areas of practice for charges incurred in connection with each client’s case.

7. Debtor has agreed to pay Norred Law's fees and costs by direct payment pursuant to Legal Services Agreements attached as Exhibit A to this declaration.

8. Norred Law was retained by the Debtor about November 10, 2022, for the Chapter 11 Retainer when it began rendering legal advice and services to Debtor related to preparation for this bankruptcy filing.


9. Norred Law has been providing assistance to Debtor in accordance with the terms and conditions which are set forth herein and in the Application. Accordingly, I make this declaration in support of an order authorizing such retention.

10. I have read the Application to Employ Counsel for Debtor filed in this case, know the contents, and verify the statements are true and correct to my personal knowledge and belief.

11. No promises have been received by Norred Law or any partner, counsel, associate or professional of Norred Law, as to payment or compensation in connection with this case in accordance with the provisions of the Bankruptcy Code, the Bankruptcy Rules and the Local Rules and Orders of the Court. Norred Law has no agreement with any other entity to share with such entity any compensation received by Norred Law.

12. This Declaration is also submitted as the statement required pursuant to sections 328(a), 329, and 504 of title 11, United States Code (11U.S.C. §§ 101 *et seq.*) ("Bankruptcy Code") and Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules").

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Warren V. Norred", written in a cursive style.

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Warren V. Norred  
Attorney for Norred Law PLLC

Executed December 16, 2022.